

EJLB CENTRAL DISTRICT COURT		
12/10/2025		
CENTRAL DISTRICT OF CALIFORNIA		
BY:	LFA	DEPUTY

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

v.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING,
LLC, a Delaware limited liability
company; GUY KOREN, an individual;
POTATO CORNER LA GROUP, LLC,
a California limited liability company;
NKM CAPITAL GROUP, LLC, a
California limited liability company; J &
K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California
limited liability company; J&K
VALLEY FAIR, LLC, a California
limited liability company; J & K
ONTARIO, LLC, a California limited
liability company; HLK MILPITAS,
LLC, a California, limited liability
company; GK CERRITOS, LLC, a
California, limited liability company;
J&K PC TRUCKS, LLC, a California
limited liability company; and, GK
CAPITAL GROUP, LLC, a California
limited liability company and DOES 1
through 100, inclusive,

Defendants.

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld

**DECLARATION OF MICHAEL
MURPHY IN RESPONSE TO
ORDER TO SHOW CAUSE
DATED NOVEMBER 24, 2025**

1 PCJV USA, LLC, a Delaware limited
2 liability company; PCI TRADING LLC,
3 a Delaware limited liability company;
4 POTATO CORNER LA GROUP LLC,
5 a California limited liability company;
6 GK CAPITAL GROUP, LLC, a
7 California limited liability company;
8 NKM CAPITAL GROUP LLC, a
9 California limited liability company; and
10 GUY KOREN, an individual,

11 Counter-Claimants,

12 v.

13 SHAKEY'S PIZZA ASIA VENTURES,
14 INC, a Philippines corporation,

15 Counter Defendant.

16 PCJV USA, LLC, a Delaware limited
17 liability company; PCI TRADING LLC,
18 a Delaware limited liability company;
19 POTATO CORNER LA GROUP LLC,
20 a California limited liability company;
21 GK CAPITAL GROUP, LLC, a
22 California limited liability company;
23 NKM CAPITAL GROUP LLC, a
24 California limited liability company; and
25 GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a
California corporation; CINCO
CORPORATION, a Philippines
corporation; and DOES 1 through 10,
inclusive,

Third Party Defendants.

DECLARATION OF MICHAEL MURPHY

1
2 1. I am former counsel of record for Shakey's Pizza Asia Ventures, Inc.,
3 SPAVI International USA, Inc., PC International LTE, and Cinco Corporation. I
4 submit this declaration in response to this Court's Order to Show Cause issued on
5 Monday (Dkt. 332), the beginning of the week of Thanksgiving, ordering me to
6 show cause why I should not be sanctioned.

7 2. I ceased to be affiliated with Fox Rothschild after I began treatment for
8 a serious medical condition in early October. I would have preferred any
9 information about my health not be in the record, but I have no choice to disclose at
10 least that much given the severity and implications of the Court's Order. I remain
11 under the care of physicians and that is currently my full-time job. I decline to share
12 any further details about what I am going through. I will state however, that I have
13 under no certain terms "abandoned" this case nor my former clients. I have taken
14 every action possible to engage the Special Master, and I am not the cause of any
15 ongoing delay.

16 3. On November 3, 2025, after learning of this Court's prior order as to
17 my role in the Special Master proceeding, I contacted the Special Master – directly
18 – by email and made myself available to him to be interviewed.

19 4. That same day, November 3, 2025, I received an email from the
20 Special Master stating that the Court wanted this done "ASAP, but [his] schedule
21 will not permit such," and as a result he was "awaiting hearing back from the court
22 for timing." The Special Master concluded his email by stating: "Thank you for
23 reaching out and I will keep you posted."

24 5. I responded that evening – November 3, 2025 – stating, simply,
25 "Thank you, Your Honor" and "I will make myself available at your convenience."

26 6. I have not received any further communications from the Special
27 Master. I have since reached out to him to determine whether there are any updates
28 and have received none.

1 7. On November 24, 2025, I followed up with the Special Master with an
2 email inquiring as to when I can be interviewed, and have not yet received a
3 response.

4 8. As a result of these communication, I would invite the Court to
5 conclude that I am not holding up any investigation. I have been, and remain,
6 available. The moment I receive a communication or request from the Special
7 Master, I will immediately respond and coordinate schedules. Until then, there is
8 nothing in my power that can be done to accelerate the process.

9 9. Regarding the change of addresses, which the Court wondered was the
10 reason for my interview not having yet occurred, I hope that the above testimony
11 will confirm that the address change does not have anything to do with it.

12 10. To the extent the Court has concluded that my not having changed my
13 address was somehow a violation of the local rules, as I read the Local Rule cited, I
14 would not “be authorized” to identify myself as counsel of record with a new email
15 and mailing address, and, as such, was not also required to advise this Court as to a
16 new address (email or physical). Fox Rothschild represents the Plaintiff and
17 Counterclaim Defendants, not me, personally, and this has been the case since late
18 February 2025. Moreover, I only recently formed a new law corporation with a
19 domain that I can use for email addresses going forward, as prior to that, from early
20 October onward, I was largely unreachable having handed the reins to other
21 attorneys at Fox Rothschild. I have not abandoned this case, nor abandoned a client.
22 I take my obligations very seriously, and care very much for SPAVI and its
23 principals, as well as Cinco. I would never do such a thing.

24 11. To the extent the Court continues to believe I remained obligated to
25 update my information previously, my failure in having done so was not designed
26 to indicate disrespect for this Court or the process. Should this Court seek
27 additional information, I can be reached at mmurphy@mdmurphylegal.com.

CERTIFICATE OF SERVICE

The undersigned certifies that, on February 27, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: November 24, 2025

FOX ROTHSCHILD LLP

Michael D. Murphy